

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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LARRY THOMPSON,

Plaintiff,

**DECLARATION OF  
DAVID ZELMAN IN  
SUPPORT OF  
PLAINTIFF'S MOTION  
FOR PARTIAL  
SUMMARY JUDGMENT**

-against-

THE CITY OF NEW YORK, et. al.

Case No.: 14-CV-7349

Defendants.

X

DAVID A. ZELMAN, Esq., an attorney duly licensed to practice law before the Eastern District of New York, as and for the plaintiff's declaration in support of his motion for partial summary judgment, being duly sworn deposes and says, upon information and belief, as follows:

1. I submit this declaration to provide the court and counsel with a compendium of plaintiff's exhibits.
2. Plaintiff's Exhibit A is discovery provided by the City of New York to the plaintiff in this case identified by Bates numbers including, DEF 4, 5, 12, 14, 15, 16, 17, 18, 19, 20 and 23.
3. Exhibit B is the deposition transcript of plaintiff Larry Thompson.
4. Exhibit C is an affidavit executed by witness Camille Watson on June 26, 2014.
5. Exhibit D is the deposition transcript of witness Quentin Dillahunt.
6. Exhibit E is the deposition transcript of witness Matthew Marturano.
7. Exhibit F is the deposition transcript of defendant Paul Montefusco.
8. Exhibit G is the deposition transcript of witness Shantasia Prosperc.

9. Exhibit H is the deposition transcript of witness Unetta Nurse.
10. Exhibit I is the deposition transcript of witness Talleta Watson.
11. Exhibit J is the Plaintiff's First Set of Document Demands.
12. Exhibit K is the deposition transcript of defendant Anthony Bertram.
13. Exhibit L is the Defendants' Responses And Objections to Plaintiff's First Set of Document Demands.

Dated: Brooklyn, New York  
March 10, 2017

**LAW OFFICE OF DAVID A. ZELMAN**

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By: David A. Zelman, Esq.  
Attorney for Plaintiff  
612 Eastern Parkway  
Brooklyn, New York 11225  
(718) 604-3072